

Exhibit 10

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

STATE OF MISSOURI ex rel. ERIC S.
SCHMITT, Attorney General, *et al.*;

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official capacity
as President of the United States, *et al.*;

Case No. 3:22-cv-01213

Defendants.

SUPPLEMENTAL DECLARATION OF JILL HINES

1. My name is Jill Hines. I am over the age of 18 years and competent to testify to the matters expressed herein. I make this Supplemental Declaration in support of my case against Defendants.
2. I have previously submitted Declarations in this case, which are filed with the Court as Doc. 10-12 and Doc. 45-12. Those prior Declarations are incorporated by reference herein.
3. I am a Co-Director of Health Freedom Louisiana, a consumer and human rights advocacy organization.
4. The Supreme Court has incorrectly referred to me as a healthcare advocate. I am a health *freedom* advocate, meaning I advocate for informed consent and the right to refuse unwanted medical interventions, both of which are foundational tenets of human rights and medical ethics. I continue to testify before the state legislature to advocate for legislation that will protect students, employees, and Louisiana citizens from medical mandates.

5. I continue to provide commentary on state and national politics as a natural outgrowth of Reopen Louisiana, the grassroots effort I founded in April 2020, during the covid shutdown.

6. My views and commentary on social media, both on Facebook and Instagram, continue to encounter censorship and suppression. It is important that the Court is aware that removal of posts on Facebook and Instagram has a cumulative effect whereby accounts do not go back to normal after a post is removed or an infraction occurs. It takes time to recover and rebuild audience reach, if it occurs at all.

7. My two Facebook groups, HFL Group and HFL Northshore, that were previously deplatformed have never been restored.

8. Most recently, on September 3, 2024, Facebook added a “fact check” notice to a post I shared on my personal page about a man who experienced aggressive cancer after receiving a covid booster vaccine. The post was “moved lower in my Feed” and a “partly false” label was added. According to a Science Feedback article, “regulatory agencies knew of residual DNA in COVID-19 mRNA vaccines; no evidence this poses health concern.” The photo I shared in the post was from a case study published in Frontiers in 2021.

9. In June 2024, I shared a post on my personal Facebook page stating the U.S. Department of Defense (DoD) is desperate for recruits, evidenced by the push to register young women for selective service. The post stated the DoD is desperate because the Covid vaccine mandate has injured and killed so many service members that the U.S. is in danger of not having a functioning force to respond to an attack. Facebook added a fact check to the post and moved it lower in my Feed.

10. In June 2024, I shared a post on Reopen Louisiana’s Facebook page that was removed by Facebook almost immediately. I shared a screenshot of Libs of TikTok’s X account that identified

the White House’s Associate Communications Director, Tyler Cherry. My commentary on the post was, “We are the laughingstock of the world.”

11. In June 2024, Instagram added a “false information” label over a video I shared on Health Freedom Louisiana’s page in which Dr. Pierre Kory states in an interview that because of the Covid vaccines, he now questions the safety of the childhood vaccine schedule. The only commentary I added to the post was, “Question everything!!”

12. In April 2024, during our legislative session, I advocated for legislation that would require coroners to include an infant’s immunization history in the autopsy if the infant died suddenly and without explanation. I shared a post on Instagram of an HFL document that shows the comparison of the vaccinations an infant would receive in 1983 versus the number of vaccinations an infant would receive in 2024, with the explanation that an infant will receive 43 vaccinations in the first year of life including in utero, along with a comment that the vaccine companies are free from liability. Instagram covered the image, added a “False” label, and moved the post lower in the Feed. The bill did not pass.

13. In March 2024, a post from March 2021 was removed from HFL’s Facebook page – three years later. The post I made asks if parents should be the sole decision makers about whether a child wears a mask. Instead of spelling out “mask,” we used an emoji. It took Facebook three years to find that post. Perhaps the emoji worked.

14. In February 2024, Instagram added a “false information” label over an Epoch Times article discussing a study which indicates that Covid mRNA vaccines caused more deaths than they prevented.

15. In January 2024, after much deliberation, I decided to attempt to purchase ad space on Facebook. HFL’s Facebook page reach is incredibly low, despite having over 13,000 followers,

but I was desperate to make people aware of an opportunity to share their Covid stories with journalist Polly Tommey on the Children's Health Defense bus as it traveled through Louisiana. I received a notice from Facebook stating, "Page Not Allowed to Advertise." Despite having a business legally registered and in good standing with the Secretary of State, Facebook refused to sell me ad space for HFL.

16. In January 2024, I shared a screenshot of an X post by Informed Consent Action Network attorney Aaron Siri which showed images of the number of vaccinations an infant would receive by age one in 1986 compared to the number of vaccinations an infant would receive by age one in 2024. The post also discussed the "1986 act," the National Childhood Vaccine Injury Act, "which gave pharma companies immunity for vaccine injuries." Instagram labeled this "Partly False," stating the law does not stop people from suing vaccine manufacturers.

17. In November 2023, I shared a screenshot of Congressman Jim Jordan's X (formerly known as Twitter) post discussing the "BOMBSHELL REPORT ON THE CENSORSHIP-INDUSTRIAL COMPLEX." The post mentions how DHS, CISA, the State Department, and Stanford University worked together to censor Americans before the 2020 election. I added a comment to the screenshot discussing how I had filed suit against Stanford Internet Observatory with the help of my attorney, John Sauer, and America First Legal. This post was removed for "infringing on someone else's trademark rights." A screenshot from a sitting congressman is public record as well as information gathered by the congressional committee. The only things infringed upon are my rights, as evidenced by the bombshell report.

18. In September 2023, I saw a Facebook "memory" of a speech I gave in 2021 on the steps of the Capitol in Baton Rouge. In the speech, I shared about how exhausting fighting government overreach had been but that it was a worthy cause. I told listeners, "Do not comply!" When I

clicked the share button to share from my HFL page to my personal page, I received a notice stating, “This page has repeatedly shared false information.” This warning occurred during the Louisiana statewide election, so I am sure others received similar notices when attempting to share from our page and decided not to share our posts.

19. In September 2023, I shared a video of Dr. Scott Jensen, former state senator and candidate for governor of Wisconsin, discussing the fraud surrounding COVID-19 death certificates with Dr Jordan Peterson. Facebook added a label to the post that it was “missing context.” The notice included a warning that people who share false information might have their posts moved lower in the News Feed.

20. In August 2023, I shared a video of Pfizer employees testifying before the Australian parliament that Pfizer employees received a special batch of covid vaccines. Facebook added a “Partly False” label to the post.

21. In July 2023, I shared a video of Biden falling asleep in the Oval Office while speaking with Israeli President Herzog. Facebook labeled it “False information.” My commentary on the post was, “A reminder of what we’re up against. They hate our country this much.”

22. In May 2023, I shared a post to the Reopen Louisiana Facebook page of a screenshot of an X post by a user named “Catturd” showing a picture of Biden receiving a Covid vaccine with the headline from Leading Reports that “A European study has found COVID vaccines could be causing ‘long-term brain damage.’” Facebook added a “False information” label and warned that accounts that repeatedly share false information might be restricted.

23. In April 2023, I shared a screenshot of Robert F. Kennedy Jr.’s X post where he discusses Tucker Carlson being fired from Fox News for discussing the harmful effects of the Covid vaccines. The post was removed for not following “Community Standards.”

24. All of these posts were made after the Biden Administration supposedly considered the Covid emergency to have ended.

25. I plan to continue to post similar content for the foreseeable future and am likely to comment upon the upcoming presidential election.

I swear or affirm under penalty of perjury that the foregoing is true and correct.

Dated: September 17, 2024

Signed: *s/ Jill Hines*